

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LARRY SAMMS)	Civil Action No.:
)	
Plaintiff,)	15-cv-02741-JSR
V.)	
)	
ABRAMS, FENSTERMAN, FENSTERMAN,)	
EISMAN, FORMATO, FERRARA, & WOLF, LLP,)	
)	
Defendants.)	
-----X		

**DECLARATION OF ANTHONY GENOVESI, ESQ. IN OPPOSITION TO
PLAINTIFF'S MOTION FOR ATTORNEY'S FEES**

Anthony Genovesi, an attorney duly admitted to practice law before the courts of the State of New York, hereby affirms the following under the penalty of perjury:

1. I am an attorney with the law firm of ABRAMS, FENSTERMAN, FENSTERMAN, EISMAN, FORMATO, FERRARA, & WOLF, LLP, the Defendants herein.
2. I make this Declaration on my personal knowledge in opposition to Plaintiff's Motion for Attorney's Fees and Costs and based on my involvement as the handling attorney of the underlying action.
3. Annexed hereto as "Exhibit A" is a true and correct copy of Guy R. Fairstein, Esq.'s billing records for the underlying State Action.
4. Annexed hereto as "Exhibit B" is a true and correct copy of Plaintiff's Rule 26(a)(1) Disclosures.
5. Annexed hereto as "Exhibit C" is a true and correct copy of Plaintiff's First Amended Rule 26(a)(1) Disclosures.

6. Annexed hereto as “Exhibit D” is a true and correct copy of Plaintiff’s Second Amended Rule 26(a)(1) Disclosures.
7. Annexed hereto as “Exhibit E” is a true and correct copy of Plaintiff’s Third Amended Rule 26(a)(1) Disclosures.
8. Annexed hereto as “Exhibit F” is a true and correct copy of Plaintiff’s Fourth Amended Rule 26(a)(1) Disclosures.
9. Annexed hereto as “Exhibit G” is a true and correct copy of the Honorable Richard J. Sullivan’s Transcript dated March 21, 2013.
10. Annexed hereto as “Exhibit H” is a true and correct copy of Plaintiff’s Retainer Agreement between Plaintiff Larry Samms and Ahmad Keshavarz, Esq.
11. Annexed hereto as “Exhibit I” is a true and correct copy of the Offer of Judgment.

Respectfully submitted,

/s/

Anthony J. Genovesi, Jr.

Abrams, Fensterman, Fensterman, Eisman,

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CERTIFICATE OF SERVICE

I hereby certify that on this day I served the above referenced document to the parties listed below email to:

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Dated: June 1, 2016
Lake Success, NY